November 21, 2016

Mr. Guy Donaldson
Chief, Air Planning Section
U.S. Environmental Protection Agency – Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202

RE: Regional Haze, Texas BART FIP
W.A. Parish Units 5 & 6

Dear Mr. Donaldson,

NRG Texas Power LLC, (NRG Texas) appreciates the opportunity to provide additional information to EPA regarding the Best Available Retrofit Technology ("BART") for Units 5 and 6 at the NRG Texas W.A Parish (Parish) power plant in Fort Bend County, Texas.

NRG Texas is currently evaluating a variety of potential approaches to managing BART for these electric generating units. For example, we are studying the justification for and effect of adjustments to air quality modeling programs that may affect whether or not the units should be found to be "subject to BART" on the basis of their minimal impact on visibility impairment at Class I areas. As another example, we are considering opportunities to adjust the mixture of fuels burned at the units, along various timelines, in a manner that could significantly reduce visibility-impairing emissions. These types of considerations may affect the overall level of emissions control to be required, the incremental costs and benefits of various control options, and the most appropriate form for any emission limits to be established in EPA's BART action. To assure that EPA may fully and promptly consider these and other relevant considerations consistent with its obligations under the Administrative Procedure Act, we request that EPA include an appropriately broad comment solicitation in its proposed Texas BART action with respect to Parish Units 5 and 6.

Specifically, NRG Texas respectfully requests that EPA solicit public comment on the following aspects of its BART determination for Parish Units 5 and 6:

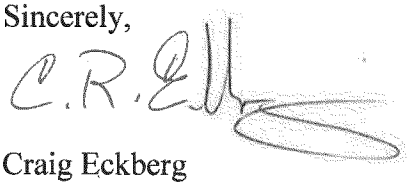
- *Subject-to-BART analysis;*
- *BART determinations, and on potential alternatives to each of our determinations. In particular, these units both have the capability for full or partial natural gas firing in the future. In light of this capability, we are requesting comment on alternative technology approaches to establishing BART, alternative control measures, alternative BART emission rates, alternative BART limit forms (e.g., rate, concentration,*

percent reduction and mass limits), potential full or partial fuel switching and repowering opportunities, and remaining useful lives of these units while combusting coal;

- *Integrating multiple options as alternatives for compliance with a BART limit; and*
- *The effects of these options on the relative costs associated with, and the appropriateness of, potential BART controls in relation to the relative visibility benefits of each of the control alternatives.*

NRG Texas appreciates your consideration of our request. If you would like to discuss further, please contact me at 832-357-5291 or craig.eckberg@nrg.com.

Sincerely,



Craig Eckberg
Director, Environmental Services
Gulf Coast Region